

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

NATIONAL RIFLE ASSOCIATION OF
AMERICA,

Plaintiff/Counter-Defendant,

v.

LOCKTON AFFINITY SERIES OF
LOCKTON AFFINITY, LLC, and KANSAS
CITY SERIES OF LOCKTON COMPANIES,
LLC,

Defendants/Counter-Plaintiffs.

Civil Action No.: 1:18-cv-00639-LO-JFA

**MOTION TO QUASH THIRD-PARTY SUBPOENA TO THE BUREAU OF
INSURANCE OF THE VIRGINIA STATE CORPORATION COMMISSION**

Third-Party Bureau of Insurance of the Virginia State Corporation Commission (the "Bureau"), by and through its undersigned counsel, respectfully moves this Court, pursuant to Rule 45(d)(3) of the Federal Rules of Civil Procedure, to quash the third-party subpoena *duces tecum* served upon the Bureau by Plaintiff/Counter-Defendant National Rifle Association of America on November 1, 2018. Because any response "requires disclosure of privileged or other protected matter," for the reasons stated in the Bureau's Memorandum of Law filed concurrently in support of its motion, this Court should quash this third-party subpoena. Fed. R. Civ. P. 45(d)(3)(A)(iii).

Dated: November 15, 2018

Respectfully submitted,

THE BUREAU OF INSURANCE OF
THE VIRGINIA STATE CORPORATION
COMMISSION

By: /s/ Patricia A.C. McCullagh

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CERTIFICATE OF SERVICE

I hereby certify that on the 15th of November 2018, I served a copy of the foregoing upon the following counsel via CM/ECF:

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